

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

GOLDMAN & BESLOW LLC
Attorneys at Law
7 Glenwood Avenue
Suite 311b
East Orange, New Jersey 07017
(973) 677-9000 (phone)
(973) 675-5886 (fax)
David G. Beslow, Esq. DGB-5300
Attorney for Debtors, George L Franic and Dian
Susan Franic

In Re:

GEORGE L FRANIC,
DIAN SUSAN FRANIC

Case No.: 22-1421

Judge: JKS

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION

The debtor in this case opposes the following (**choose one**):

1. ☒ Motion for Relief from the Automatic Stay filed by Phoenix Funding, Inc., creditor,

A hearing has been scheduled for January 12, 2022, at 10:00 am.

- ☐ Motion to Dismiss filed by the Chapter 13 Trustee.

A hearing has been scheduled for _____, at _____.

- ☐ Certification of Default filed by _____,

I am requesting a hearing be scheduled on this matter.

2. I oppose the above matter for the following reasons (**choose one**):

- ☐ Payments have been made in the amount of \$ _____, but have not been accounted for. Documentation in support is attached.

☐ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

☒ Other (**explain your answer**):

The tax lien holder's certification is incorrect. Part of the money claimed owed in its certification is a pre-petition obligation to the City of Clifton. We have attached as an Exhibit a letter from the City of Clifton showing only \$2,067.13 in post-petition obligations, representing the last quarter of 2022 plus a small sewer bill. We are in process of working out a repayment plan with Clifton.

3. This certification is being made in an effort to resolve the issues raised in the certification of default or motion.
4. I certify under penalty of perjury that the above is true.

Date: January 5, 2023 *Jan 5/2023*

/s/ George L Franic
Debtor's Signature

George L Franic

Date: January 5, 2023 *Jan. 5/2023*

/s/ Dian Susan Franic
Debtor's Signature

Dian Susan Franic

NOTES:

1. Under D.N.J. LBR 4001-1(b)(1), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 7 days before the date of the hearing if filed in opposition to a Motion for Relief from the Automatic Stay or Chapter 13 Trustee's Motion to Dismiss.
2. Under D.N.J. 4001-1 (b)(2), this form must be filed with the court and served on the Chapter 13 Trustee and creditor, if applicable not later than 14 days after the filing of a Certification of Default.